

**REMARKS**

Claims 20, 30, 36, and 42 have been amended, and support for these amendments can be found at least in paragraphs [0052], [0055], [0060], and [0084] of the published subject application.

The claims as amended are allowable because the cited references, alone or in combination, do not disclose all of the claimed elements. As amended, the claims now clarify that pairing occurs by the learning of an object's identifier. Liotine does not perform such pairing, and Heitschel, Clark, and Little do not remedy that deficiency. Accordingly, the pending claims, as amended, are not obvious over the cited references.

Applicant respectfully reconsideration of the pending rejections, and earnestly solicits a Notice of Allowance.

**I. Claims 20-24, 26-27, 30-34, 36-40, 42, and 44**

Applicant respectfully traverses the Office Action's rejection of claims 20-24, 26-27, 30-34, 42, and 44 under 35 U.S.C. § 103(a) as being unpatentable over Liotine (U.S. Patent No. 4,529,980) in view of Heitschel (U.S. Patent No. 5,576,701).

**A. Liotine**

The Office Action correctly notes on page 4 thereof that Liotine does not disclose "when a command is sent from one object to another object with which it is paired, verifying that the two objects contain the new common key; and refusal by the other object to execute the command if the two objects do not contain the new common key, although the objects are paired." However, applicant respectfully submits that Liotine also does not teach other limitations of the claimed invention.

For example, applicant respectfully submits that Liotine does not disclose at least two objects "containing a common key . . . being paired when a first object has learned an identifier of a second object" and "keeping in the memory of each object the pairing information of identifiers of other objects to which the object is

paired” (claim 20). Further, applicant respectfully submits that Liotine does not disclose “a routine for learning and keeping in the memory the pairing information of identifiers of other objects to which the bidirectional object is paired” (claims 30 and 36) or “a routine adapted to learn and keep in memory the pairing information of identifiers of other objects to which the bidirectional object is paired” (claim 42).

In the claimed invention, sharing a common key and being paired are separate and distinct requirements. All objects of an installation contain a common key, but a first object of the installation is only paired with a second object of the installation when the first object has learned the identifier of the second object. See Autret, pars. [0052], [0055]. Further, even when a new common key is provided to all objects in the installation, the pairing information of identifiers is kept in the memory of each object. See Autret, pars. [0055], [0060].

The Office Action equates the code shared by the transmitter 9 and receiver 30 of Liotine with the common key of the claimed invention. See Liotine, col. 4, ll. 44-54 and Office Action, p. 2. However, other than the shared code, Liotine does not appear to disclose the transmitter 9 and receiver 30 sharing any other common information or learning any other information about one another.

As explained above, sharing a common key and pairing by learning an object’s identifier are separate and distinct requirements of the claimed invention. Accordingly, if the shared code in Liotine is equivalent to the “common identifier” of the claimed invention,” the shared code in Liotine cannot be equated with the “pairing information of identifiers” as in the claimed invention. However, no other element of Liotine teaches this requirement. Therefore, Liotine does not disclose each and every limitation of claims 20-24, 26-27, 30-34, 36-40, 42, and 44.

B. Heitschel

As explained above, Liotine does not teach each and every element of claims 20-24, 26-27, 30-34, 36-40, 42, or 44. Further, applicant respectfully submits that Heitschel does not make up for at least the deficiencies of Liotine discussed above.

For example, Heitschel discloses a remote transmitter 24 transmitting a signal of coded words to a control unit 38 of an actuating system. See Heitschel, col. 3, ll. 46-55. The signal of coded words must match a sequence of allowable coded words in the control unit 38 to operate a door 17 associated with the actuating system. Other than the coded words, Heitschel does not appear to disclose the remote transmitter 24 and the control unit 38 sharing any other common information or learning any other information about one another.

Conversely, as explained above, in the claimed invention, the “common key” and the “pairing information of identifiers” are two separate and distinct requirements. Accordingly, if the coded words in Heitschel are equivalent to the “common key” of the claimed invention, the coded words in Heitschel cannot be equated with the “pairing information of identifiers” as in the claimed invention. However, no other element of Heitschel teaches this requirement.

For at least these reasons, applicant respectfully submits that Heitschel does not make up for the deficiencies of Liotine discussed above. Therefore, applicant respectfully submits that claims 20-24, 26-27, 30-34, 36-40, 42, and 44 are not obvious over Liotine in view of Heitschel and respectfully requests allowance of these claims.

**II. Claims 25, 28, 35, 41, and 43**

Applicant respectfully traverses the Office Action’s rejection of claims 25, 28, 35, 41, and 43 under 35 U.S.C. § 103(a) as being unpatentable over Liotine in view of Heitschel and further in view of Clark (U.S. Patent No. 5,148,159). As explained above, claims 20, 22, 30, and 36, from which these claims depend, are not obvious over Liotine in view of Heitschel. Furthermore, Clark does not make up for at least the deficiencies of Liotine and Heitschel discussed above.

For at least these reasons, applicant respectfully submits that claims 25, 28, 35, 41, and 43 are not obvious over Liotine in view of Heitschel and further in view of Clark. Therefore, applicant respectfully requests allowance of these claims.

### **III. Claim 29**

Applicant respectfully traverses the Office Action's rejection of claim 29 under 35 U.S.C. § 103(a) as being unpatentable over Liotine in view of Heitschel and further in view of Little (U.S. Patent No. 7,046,991). As explained above, claim 22, from which claim 29 depends, is not obvious over Liotine in view of Heitschel. Furthermore, Little does not make up for at least the deficiencies of Liotine and Heitschel discussed above.

For at least these reasons, applicant respectfully submits that claim 29 is not obvious over Liotine in view of Heitschel and further in view of Little. Therefore, applicant respectfully requests allowance of this claim.


**IV. Closing Remarks**

For the foregoing reasons, applicant submits that the subject application is in condition for allowance and respectfully requests allowance of the application. Should the Examiner be of the opinion that a telephone conference would expedite the prosecution hereof, the Examiner is respectfully requested to call the undersigned at the below-listed number.

The Commissioner is hereby authorized to charge any additional fee which may be required for this application under 37 C.F.R. §§ 1.16-1.18, including but not limited to the issue fee, or credit any overpayment, to Deposit Account No. 23-0920. Should no proper amount be enclosed herewith, such as a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal, or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 23-0920.

Respectfully submitted,

Dated: October 10, 2009

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